

REMARKS

In the Office Action dated January 16, 2003, the Examiner rejected claims 21, 22, and 24-26 under 35 U.S.C. § 102 as being anticipated by Ogando ("Tooling Close-Up. Get Custom Hot Halves in a Hurry." Plastic Technology Online, September 1999). The Examiner also rejected claims 1-14 and 21-26 under 35 U.S.C. § 103 as being unpatentable over the Applicant's Admitted Prior Art (APA) in view of Freer (U.S. Patent No. 5,392,502). The Examiner further rejected claims 21-26 under 35 U.S.C. § 103 as being unpatentable over Ogando in view of the Applicant's APA. Applicants respectfully submit that neither Ogando, Applicant's APA, nor Freer, alone or in combination with another reference, discloses, teaches, or suggests the presently claimed invention for the reasons given below.

The Examiner correctly notes in the Office Action that the Applicant's APA does not teach placing hot runner system components into stock, or removing hot runner system components from stock for modifications that correspond to specifications of customer orders. Contrary to the Examiner's statements, however, Freer and Ogando also fail to disclose or teach such steps. Freer discloses a micro-machining center for tooling and machining "bar stock" into screws. The screw machine disclosed by Freer uses electronically stored screw sequences and tooling software to control the machining, in a single phase, of various types of screws from raw screw material, referred to as "bar stock." Freer does not even mention the manufacture of components, such as manifold plates, that are used to form hot runner systems. Moreover, Freer does not disclose, teach, or suggest partially manufacturing hot runner system components (from raw materials) in a first phase, placing them in stock, taking customer orders for hot runner systems, removing the components from stock, and further manufacturing or modifying the hot

runner system components in accordance with the specifications of the customer orders in a second phase.

Similarly, while Ogando discusses an allegedly improved method for manufacturing and assembling hot runner systems, referred to as Husky's Pronto, Ogando fails to disclose or teach how the Husky Pronto hot runner systems are manufactured or assembled. Unlike the presently claimed invention, Ogando completely lacks any reference to partially manufacturing hot runner system components in a first phase, placing them in stock, taking orders, and then removing the components for further manufacturing in accordance with a customer's order. On the contrary, Husky's Pronto seems to first accept customer orders for limited hot runner system configurations, and then begin the manufacturing of the hot runner system after the order has been placed (i.e., standardized hot runner systems with slight configurability but only one manufacturing phase). A Supplemental Information Disclosure Statement is being submitted herewith to provide the Examiner with more information regarding Husky's Pronto.


All of the currently pending claims recite methods for manufacturing hot runner system components, placing them into stock, accepting customer orders for hot runner systems, and removing the components from stock for modifications or further manufacturing of the hot runner systems that correspond to specifications of customer orders. As a result, the presently claimed invention allows a customer a wide range of flexibility with respect to hot runner system configurations, while providing a very fast manufacturing method for the hot runner system ordered by the customer. Consequently, neither Ogando, the Applicant's APA, nor Freer anticipates or obviates, alone or in combination with another reference, the present claims. Accordingly, Applicant respectfully requests that the Examiner withdraw the rejections of the

claims under 35 U.S.C. § 102 and § 103. Applicant believes the present claims to be in condition for allowance, and earnestly request early notification of same.

If, for any reason, the Examiner is unable to allow the application on the basis of this amendment and feels that a telephone conference would help clear up any unresolved matters, the Examiner is respectfully requested to contact the undersigned attorney at the telephone number listed below.

Respectfully submitted,
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